

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE  
ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT  
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.  
NELSON MULLINS RILEY & SCARBOROUGH LLP  
Atlantic Station, 201 17th Street, NW  
Suite 1700  
Atlanta, GA 30363  
(404) 322-6000

*Attorney for Defendant C.R. Bard, Inc.*

/s/ J. Mark Kell  
KELL LAMPIN, LLC  
5770 Mexico Road, Suite A  
St. Peters, MO 63376  
(636) 498-4878

*Attorney for Plaintiffs on Exhibit A*

Dated: March 31, 2017

**EXHIBIT A –KELL LAMPIN, LLC**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-cv-09185	Ginger Bowen and Wallace Bowen v. C.R. Bard Inc., et al.
2:13-cv-06536	Frances Carver and Henry Carver v. C.R. Bard Inc., et al.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.